

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA, *ex rel.*  
PAUL INZEO,

Plaintiffs,

v.

INDUSTRIES FOR THE BLIND, INC., *et al.*,  
Defendants.

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FILED UNDER SEAL

Civil Action No. 15-C-996

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**UNITED STATES' NOTICE OF PARTIAL INTERVENTION  
FOR SETTLEMENT PURPOSES  
AND REQUEST TO PARTIALLY LIFT THE SEAL**

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Pursuant to the False Claims Act, 31 U.S.C. §§ 3730(b)(2) and (b)(4), the United States of America notifies the Court of its decision to partially intervene for settlement purposes against defendant Industries for the Blind, Inc. (IBI). The United States does not elect to intervene against any other defendants named in the Complaint.

The United States and Relator have settled the claims asserted against IBI in this matter. Upon payment pursuant to the settlement agreement, the United States and Relator will file a Joint Stipulation of Dismissal as well as an accompanying proposed order.

The United States further requests a partial lifting of the seal so that (a) the Complaint, (b) this Notice of Partial Intervention for Settlement Purposes and Request to Partially Lift the Seal, (c) the Joint Stipulation of Dismissal, and (d) any resulting order(s) from these requests may be publically disclosed. Except for those documents, the United States requests that all other pleadings (including, but not limited to, all requests for extensions and any memoranda in support

thereof) remain under seal and not be made public or served upon the defendants. Those filings are provided by law to the Court alone and discuss the content and extent of the United States' investigation for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended. Therefore, the United States requests that the seal be maintained on all other pleadings filed in this case.

A proposed order accompanies this Notice of Partial Intervention for Settlement Purposes and Request to Partially Lift the Seal.

Dated this 25th day of September, 2020.

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By:



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